

TROY LAW, PLLC

ATTORNEYS / COUNSELORS AT LAW

Tel: (718) 762-1324 troylaw@troypllc.com Fax: (718) 762-1342

41-25 Kissena Boulevard, Suite 110, Flushing, NY 11355

November 7, 2024

Via ECF

Hon. Stewart D. Aaron, U.S.M.J.
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Plaintiff's Letter Certifying the Close of Discovery

Sarikaputar et al v. Veratip Corp., No. 19-cv-11168 (ALC), (S.D.N.Y.)

Your Honor,

This office represents the Plaintiffs in the above-referenced matter. We write in regard to the Scheduling Order dated May 3, 2024, directing the parties to file a joint letter certify the close of discovery by November 6, 2024. The parties are also in receipt of the September 23, 2024 order stating that "this case was filed in 2019 and the deadline to complete discovery is October 30, 2024. (5/3/24 Scheduling Order, ECF No. 96.) The parties thus are directed to expeditiously litigate this case in order to meet the current deadline to complete discovery. Additionally, the parties are informed that any further extension of the discovery deadline will require a substantial showing of good cause and if any such extension is granted, it will only be for limited purposes."

Thus, Plaintiffs respectfully report that discovery is closed, and respectfully request that dates be set for pre-trial submissions.

In conferring with the Defendants, Defendants did not wish to join the letter. They disagree and state that they should be allowed to conduct Plaintiffs' deposition. However, the time allotted for the depositions have elapsed and Plaintiffs respectfully submit that Defendants cannot show a substantial showing of good cause since Defendants have delayed the process of discovery in the delay in providing paper responses for their clients until October 18, 2024 and their proposed deposition dates on October 30, 2024 (the discovery end date) are all after the close of discovery. As a result, Plaintiffs respectfully request that the Court mark the discovery as closed.

Plaintiffs thank the court for their time and consideration in the above-mentioned matter.

Respectfully submitted,

TROY LAW, PLLC

/s/ John Troy

John Troy

Attorney for Plaintiffs

cc: via ECF

all counsel of record

JT/mh